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E-Filed on:

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re: Marilyn Froese,)	BK-S-09-31177-lbr
)	
)	CHAPTER 7
)	
DEBTOR(S).)	
_____)	

EX-PARTE MOTION FOR AN ORDER REOPENING CASE

PURSUANT TO 11 U.S.C. §350(B)

TO: The Honorable Linda B. Riegle, United States Bankruptcy Judge:

COMES NOW, MARILYN FROESE, ("Debtor"), by and through his attorney of record, RICHARD E. HAWKINS, ESQ., of the HAWKINS LAW FIRM, and moves this Court pursuant to 11 U.S.C. §350 (b) and F.R.B.P. 5010. This motion is made and based upon the following Memorandum of Points and Authorities and the pleadings and papers filed in this case.

MEMORANDUM OF POINTS AND AUTHORITES

1. Debtor's case was converted to Chapter 7 of the Bankruptcy Code on January 27, 2010.
2. The Chapter 7 Meeting of creditors was held March 1, 2010, and proof of taking the Financial Management Course was to be filed by April 14, 2010.
3. On May 3, 2010, this Case was closed without discharge because the Debtor failed to file

the Official form 23, Debtor's Certification of Completion of Instructional Course Concerning Personal Financial Management.

4. Debtor had failed to complete the Instructional Course Concerning Personal Financial Management, but as of April 19, 2010 has completed said course see certificate attached hereto as Exhibit "A", and wishes to reopen the case to file the certificate, and thereby receive a discharge in this case.
5. Richard E. Hawkins, Esq. certifies that he has not charged debtors for his services regarding this motion and order.

LEGAL ARGUMENT

According to 11 U.S.C. § 350(b) a bankruptcy case may be re-opened:

“in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause.”

The Debtor in this case is in need of relief pursuant to 11 U.S.C. § 350(b) and should be accorded this relief.

THEREFORE it is requested this case be re-opened and that the Debtor be allowed to file his certification of completion of the Instructional Course Concerning Personal Financial Management and that his discharge be entered in the ordinary course.

DATED this 12th day of May, 2010.

HAWKINS LAW FIRM

BY /s/ Richard E. Hawkins, Esq.
RICHARD E. HAWKINS, ESQ.
4680 Polaris St.
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Las Vegas, Nevada 89103
Attorney for the Debtor(s)

EXHIBIT A: Course Certificate

Certificate Number: 02910-NV-DE-010681016

Bankruptcy Case Number: 09-31177

CERTIFICATE OF DEBTOR EDUCATION

I certify that on April 19, 2010, at 8:44 o'clock AM EDT,
Marilyn J. Froese completed a course on personal financial
management given by internet by
InCharge Education Foundation, Inc.,
a provider approved pursuant to 11 U.S.C. § 111 to provide an instructional course concerning
personal financial management in the District of Nevada.

Date: April 20, 2010 By /s/Gloria McCall-Russell

Name Gloria McCall-Russell

Title Certified Bankruptcy Counselor